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ACTION PLAN ON FOOD PROMOTIONS AND CHILDREN'S DIETS

Executive Summary

1. This paper summarises responses to the consultation on the Action Plan on Food Promotions and Children's Diets and seeks agreement to move to implementation of a revised Plan.
2. The Board is invited to:
 - **note** the results of the consultation on the Action Plan, including the work seeking the views of young people;
 - **note** the work already underway on definition of high fat, sugar or salt and healthier options;
 - **discuss** proposed changes to the Action Plan;
 - **agree** the revised Action Plan (Annex 1); and
 - **agree** to review progress in implementation after two years, with regular updates in the interim.

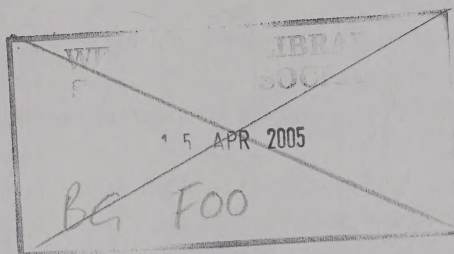
FOOD LABELLING AND STANDARDS DIVISION NUTRITION DIVISION

Contacts: Rosemary Hignett Tel: 020 7276 8180 (GTN 276 8180)
Email: rosemary.hignett@foodstandards.gsi.gov.uk

Jonathan Back Tel: 020 7276 8168 (GTN 276 8168)
Email: jonathan.back@foodstandards.gsi.gov.uk

Tom Murray Tel: 020 7276 8980 (GTN 276 8980)
Email: tom.murray@foodstandards.gsi.gov.uk





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ACTION PLAN ON FOOD PROMOTIONS AND CHILDREN'S DIETS

Issue

1. To finalise the Agency's Action Plan on Food Promotions and Children's Diets.

Strategic Objectives

2. This policy contributes to the Agency's objectives to promote healthy eating, informed choice and best practice in the food industry.

Background

3. At its open meeting on the 11 March 2004 the FSA Board discussed a paper on Promotional Activity and Children's Diets¹ and agreed to consult on a draft Action Plan on Food Promotions and Children's Diets. Members agreed that action was necessary because many children have poor diets and this has a range of adverse health consequences. Their concerns included, but were not limited to, the contribution of total calorific intake, together with energy expenditure, to childhood obesity. The consultation, which sought views on the content, achievability, likely effectiveness and appropriate timetable for the Plan and on a draft Regulatory Impact Assessment (RIA) closed at the end of June. In issuing the plan for consultation, the Board agreed that it was necessary to differentiate between foods, snacks or meals high in fat, sugar or salt and healthier options for several actions in the plan.

Recent Developments

4. A **Health Select Committee report on Obesity** which was published on the 27 May² made a number of recommendations which are relevant to the Action Plan. In particular, the Committee concluded that tighter controls on advertising and promotion of foods to children were justified, arguing that in the first instance the industry should be encouraged to take voluntary action with a review carried out after three years to determine whether legislative action was needed. The

¹ Paper FSA 04/03/02 - <http://www.food.gov.uk/multimedia/pdfs/fsa040302.pdf> & <http://www.food.gov.uk/multimedia/webpage/foodpromoannex>

² www.parliament.the-stationery-office.co.uk/pa/cm200304/cmselect/cmhealth/23/2302.htm

Committee also recommended improved standards for school meals, a move away from school based promotion of high energy density foods and introduction of a simplified food labelling scheme to make healthy choices easier.

5. On 3 March the Government launched a consultation, '**Choosing health? A consultation to improve people's health**'. A further, related consultation '**Choosing Health? Choosing a Better Diet**', was issued on 6 May. The consultations closed on 28 and 30 June respectively, and it is anticipated that responses will inform a White Paper on public health to be published in the autumn.
6. **Ofcom** has been gathering evidence for its review of the adequacy of the current TV advertising codes in relation to children's exposure to food advertising, and will publish recommendations for consultation in due course.
7. Since March there have been moves in two other EU Member States, Ireland and France, to strengthen controls on promotions aimed at children. Moves on TV broadcasting in **Ireland** would prohibit commercially driven celebrity endorsements of food and drink and require a healthy eating message to be included in advertisements for fast food. In **France** measures to balance TV advertisements for foods high in fat, sugar or salt with healthy eating messages and prohibit vending machines containing fizzy drinks and sweets are being considered. Details are in Annex 2, which also provides an update on activities in **Northern Ireland, Scotland and Wales**.
8. **BBC Worldwide** announced in April that they plan to introduce nutritional criteria for food promoted using BBC children's characters. In May **Tesco** announced a pilot scheme which would signpost levels of fat, saturated fat, sugar and salt on front of pack using traffic light colour coding to indicate high, medium and low levels. The **Co-op** already gives high/medium/low information alongside each of the nutrients listed in the nutrition panel. These initiatives show that signposting could be a practical option. In June, **McDonalds** announced that it is spending £1 million on a series of advertisements for broadcast during children's television, encouraging physical activity and consumption of fruit and vegetables.

FSA's Consumer Committee

9. The FSA's Consumer Committee discussed the Action Plan at its open meeting on 16th June. It was broadly supportive of the Plan, although it was concerned about the reliance on voluntary initiatives, which it felt would not be sufficient to deliver the desired rebalancing of promotional effort. The Committee felt that the role of health professionals, including GPs and health visitors, needed further consideration. It also called for improved co-ordination across Government, inclusion of cooking skills in the curriculum, and a UK wide healthy eating campaign to encourage behavioural change in parents and children. The Committee was very supportive of the work that the Agency is undertaking on nutrient profiling.

Views of Young People

10. In response to the Board's request to seek the views of young people, discussions have taken place with students from six secondary schools in London and Birmingham. The groups focussed on the practical implications of selected elements of the Action Plan, and sought the students' ideas for making it work in practice. The students were particularly interested in the recommendations aimed at schools. They felt that school meals should be healthy, and there was no resistance to the suggestion that fizzy drinks vending might not be allowed in schools. However, when making choices at school, and elsewhere, they were less interested in health related characteristics than price, ease, speed and taste. Students were also interested in ways of badging healthier child-purchased items, and had a high awareness of food promotions, especially those involving role models.

Discussion of Consultation Responses

11. Ninety-four responses were received from a wide range of interests, including consumer groups, individual consumers, public health and education groups, public health professionals, food manufacturers, food retailers, trade associations and advertising industry representatives. A summary is in Annex 3. Brief summaries and discussions of the main general points and the main points relating to individual sections of the Action Plan, and proposals for consequential revisions, are set out in paragraphs 12 to 29.

General comments

12. The responses revealed strong support from all interest groups for an acknowledgement of the crucial roles of parents and children themselves, and many suggested developing a public education campaign on healthy eating and/or placing more emphasis in the curriculum on practical cooking skills. Cooking skills are being tackled in the Agency's important work with DfES on the curriculum and the Cooking Bus initiative, however these are outside the scope of this paper. **It is proposed** that the Action Plan should be revised to make it clear that all its elements are intended to make it easier for parents and children to make healthier food choices.
13. Although the plan relates to diet rather than obesity, there was general agreement that obesity is linked to diet as well as physical activity and that there should be co-ordinated action across Government in relation to dietary health, including integration of the Action Plan with other initiatives in the forthcoming White Paper on Public Health.
14. Many responses were supportive, and many strongly so, of the proposed scope and nature of the Action Plan, which they considered would make an important contribution to improving children's diets and were likely to yield long term health benefits. Some, including consumer organisations, individual consumers, public health groups and public health professionals, doubted that voluntary initiatives would be effective, arguing that the severity of the likely public health consequences justified legislative action. Others, particularly food and advertising industry interests, argued that although it was clear action of some sort was needed the specific proposals were not backed up by evidence that they would be effective. A number of trade association responses strongly opposed the proposed initiatives as over-interventionist, arguing that the focus should be on public education rather than changes in industry practice. Many industry respondents also highlighted the work individual businesses and trade associations had already undertaken to promote healthier eating and indicated that they would continue to work with Government to promote healthy eating. It is not possible to predict whether a voluntary approach will be effective, however recent reports of initiatives by individual businesses give some grounds for optimism. **It is therefore proposed** that the proposed reliance on voluntary

initiatives should be maintained, except for regulatory action on health claims and nutrition labelling where EU initiatives are under way or anticipated.

15. There was some concern that the important role of public health professionals and community groups in encouraging healthy eating was not adequately reflected in the plan, but no specific actions were suggested. **It is proposed** that establishing effective consultation with all these groups, including through existing networks, should be an important priority as individual elements are firmed up and implementation taken forward. There were no suggestions on the particular needs of individual ethnic groups, but no representatives of such groups responded. **It is proposed** that the Agency should pay particular attention during implementation to assessing the needs and views of ethnic groups.
16. A number of industry respondents disagreed in principle with differentiation of foods on the basis of nutritional criteria, arguing that distinction between foods high in fat, sugar or salt and healthier options contradicts advice based on the balance of the diet overall. On the other hand, many respondents from public health interests and consumer groups strongly supported the distinction, arguing that specific advice is necessary to achieve a rebalancing of the promotional environment for children and that in practice badging of 'healthy' options by the food industry is already commonplace. Many respondents from both industry and other interests indicated that developing these criteria would be very difficult, several pointed out the particular problems in dealing with different age groups of children and a number proposed solutions.
17. Agency funded work on nutrient profiling is already under way to develop definitions of 'foods high in fat, salt or sugar' and 'healthier options' in the context of food promotions to children. A small ad hoc expert group of nutritionists, dietitians and stakeholder representatives is working on this project together with a team of consultants. Definitions which have been or are being developed in other countries, including Sweden, France and Australia, and by businesses, including Tesco, the Co-op, and Danone, are being taken into account. A number of signposting schemes are already in operation or planned; these include product ranges in all the major supermarkets, and catering supplies from Sodexo, Compass and Aramark. Initial discussions have focussed on deciding which nutrients to include and how best to combine them. The view is that the

task, whilst difficult, is achievable. The final report is expected in August and will itself be consulted on as part of the implementation of the Action Plan.

The Food Standards Agency

18. Comments on the individual initiatives assigned to the FSA are dealt with in more detail in the following sections. There were a number of comments on the proposed timetables in this section. Whilst many respondents wanted immediate action, a number of others suggested that these timetables were unrealistic, particularly on signposting, given the difficulties likely to be encountered in developing nutrient profiles. One respondent cautioned against the drive for implementation overriding the importance of establishing consensus. **It is proposed** that the timetables for advice on healthier options and signposting should be extended by three months to reflect the need to consider a wide range of options and the implications for mainstream foods.

Schools

19. There was strong support for the proposals in this section, particularly those on school meals, so long as actions were co-ordinated with other initiatives such as the 'Hungry for Success' programme (see Annex 2). Healthier vending and tuck shops (for which guidance is already available) were considered to be important, although some argued that if products offered do not appeal to students then they may leave the school premises to purchase products elsewhere. Some respondents suggested that there should be independent monitoring of schools' policies on healthy eating. A number of respondents, including the NUT, raised concerns about educational materials and **it is proposed** that current guidelines should be reviewed. One respondent suggested that the approach set out in the Action Plan should be applied in publicly funded childcare and youth services and **it is proposed** that this should be done.

Government and Ofcom (the broadcast media regulator)

20. Most respondents supported the recommendations to Government, subject to reservations about nutrient profiling (see paragraph 16). Some argued that there should be greater emphasis on the Government's role in encouraging positive promotion of healthy options, and **it is proposed** that the relevant recommendation should be amended accordingly.

21. A number of respondents, particularly those representing advertising industry interests and including some food industry representatives, asserted that TV advertising only plays a minor role in influencing children's food choices and therefore did not support the recommendations to Ofcom. Others were disappointed that the Agency had not called for a ban on advertising of products high in fat, sugar or salt during children's programming and/or prime time. Since no new evidence has become available to call into question earlier conclusions on the impact of advertising **it is proposed** that the advice to Ofcom should stand, and that FSA action to press for change, monitor progress and review its position after one year should be added to the Action Plan.

Broadcasters

22. Respondents from all sectors supported the recommendations in this section, and many commended the initiative taken by BBC Worldwide.

The ASA

23. A number of respondents raised concerns about the increasing use of new media such as mobile phones and the internet to promote foods to children. One respondent suggested that there was a need for tighter controls in promotions in magazines and on the radio. Ofcom codes cover all broadcast media, including radio. **It is proposed** that the Agency should call for an early review of the regulatory arrangements for non-broadcast media.

Food Manufacturers, retailers and the food service sector

24. The comments of industry interests about effectiveness and nutrient profiling set out in paragraphs 14 and 16 above are particularly relevant to this section, however many other respondents strongly supported the actions in this section. Several respondents suggested that targets and timetables for uptake of best practice advice should be agreed with stakeholders. **It is proposed** that the Action Plan should be amended accordingly.

25. A number of industry interests emphasised the importance of considering the impact of EU labelling initiatives and there was some concern that UK voluntary action might disadvantage UK industry against EU competitors. One response

highlighted the particular difficulties of providing nutrition information, including signposting, in the foodservice sector, although others are already doing this (see paragraph 17). Several respondents noted that the labelling recommendations had a wider application than for children's foods and that children's foods are a small element in most children's diets. **It is proposed** that discussions on both labelling and consumer information in foodservice and reduction in fat, sugar and salt should take full account of these wider interests.

26. A number of responses pointed to the difficulty of developing nutritional criteria to reduce levels of fat and sugar in foods, given their contribution to taste and other aspects of consumer acceptability, and the importance, because of concerns about calorie intake, of considering both nutrients together. Industry responses stressed the importance of changing nutrient levels gradually, to take into account consumer taste preferences. Consumer and foodservice responses pointed out that smaller portions of 'adult' meals often represent a healthier option than the 'children's menu'. It was suggested that accreditation of food outlets based on them meeting healthy eating criteria might have a particularly important role to play in the foodservice sector. **It is proposed** that these points should be considered further as guidance on reductions in fat, sugar and salt is developed.

27. One respondent suggested that snacks and soft drinks, as well as confectionery, should be removed from checkouts. **It is proposed** that the recommendation should be amended accordingly. Several retailers and the Association of Convenience Stores noted that it is often impractical to do this in smaller stores. **It is therefore proposed** that the recommendation should be amended to focus on supermarkets.

Celebrities and those who license characters and cartoons

28. This recommendation was supported. A number of respondents argued that 'celebration treat' products, such as birthday cakes and Christmas sweets/chocolates should continue to be able to be promoted using characters and cartoons.

Sponsors of events and activities

29. Some respondents felt that restricting sponsorship of events by brands associated with less healthy foods could be seen as counterproductive as it would reduce the funding available to encourage sport. It is important, however, to maintain a consistent approach across all forms of commercial sponsorship. **It is therefore proposed** that the recommendation should stand.

Regulatory Impact Assessment

30. An RIA which assesses the costs and benefits likely to arise to businesses and other stakeholders as a result of the implementation of the Action Plan has been prepared (Annex 4). The RIA identifies three main areas where there are cost implications for industry: label changes and provision of consumer information for food service; re-formulation of some products; and changes in product sales as a result of changes in the balance of promotional activity. Costs in the first two of these categories can be reduced by providing suitable lead-in periods for businesses to make any changes. If the Action Plan is successful in encouraging healthier choices then there will be a shift in the profile of product sales and businesses dependent on declining categories will be adversely affected. Businesses which concentrate on growing categories will, however, benefit. The RIA also includes a Small Business Impact Test, which examines whether the Action Plan will incur costs on Small Business that are disproportionate in relation to larger businesses. The Impact Test concludes small businesses will not be disproportionately affected. A number of consultation responses pointed to the commercial opportunities in relation to food products and services that would arise for small businesses, for example through improvements in schools meals. The RIA also identifies potential costs to schools associated with the proposals on vending, however providing guidance to schools, based on recent FSA funded research, on operating a healthy vending regime that is economically viable would mitigate this impact.

The Way Forward

31. A number of revisions to the Action Plan are proposed in paragraphs 12 to 29 and Annex 1. Work on nutrient profiling is already underway and **it is proposed** that implementation of the agreed Plan should begin immediately. **It is also**

proposed that the Board should review progress in implementation after two years, with regular updates in the interim.

Impact

32. The activities envisaged can be taken forward within existing Agency resources.

Board action required

33. The Board is invited to:

- **note** the results of the consultation on the Action Plan, including the work seeking the views of young people;
- **note** the work already underway on definition of high fat, sugar or salt and healthier options;
- **discuss** proposed changes to the Action Plan;
- **agree** the revised Action Plan (see Annex 1); and
- **agree** to review progress in implementation after two years, with regular updates in the interim.

Action Plan on Food Promotions and Children's Diets (With Revisions Tracked)

INTRODUCTION

Many children's diets are unbalanced; they contain too much fat, sugar and salt, too little starchy carbohydrate, and too few fruit and vegetables. Poor diets can lead to ill health. This consultation considers one of the many influences on children's diets, the way foods are promoted to them. The Board of the Food Standards Agency has agreed a series of actions with the intention of improving the way in which food choices are promoted to children. These recommendations are addressed to all those who are in a position to influence children's behaviour and with whom the Agency would like to work to improve children's diets. The objective is to help make it easier for parents and children to make healthier food choices.

At its open meeting on 11 March 2004 the FSA Board agreed that:

- The evidence indicates that promotional activity influences children's eating habits.
- As the eating habits of the average family have changed over recent years with a greater emphasis on snacking, convenience foods and eating out, so it has become more difficult for children to achieve a healthy balanced diet. After a wide ranging discussion on the action needed to address this issue, including the merits of distinguishing between healthier and less healthy food, the Board concluded that parents and children needed help to reduce the proportion of children's diets which are made up of foods, snacks or meals high in fat, sugar or salt in favour of healthier options. Changing the way that foods are promoted to children is one way of helping them to achieve this.
- It is time to move from debating the issue to determining solutions - and these must involve parents, children and young people, government, regulators, schools and industry.
- This action plan highlights policy recommendations, where the Agency believes that primary responsibility lies for acting on them and how the Agency will monitor the uptake of its recommendations.

1. The Food Standards Agency

- **By autumn 2004** The Agency will work with DfES to agree action to improve school meals that will cover both the provision of healthy options and how best to promote uptake of these options. (This action is dependent on the results of ongoing research due to report in ~~spring~~ summer 2004.)
- **By December 2004** The Agency will develop guidelines for schools and other publicly funded premises which children visit regularly (such as leisure centres) on healthier choice vending approaches.
- **By March 2005** The Agency will publish nutritional criteria for use by food industry (including the food service sector) that are intended to reduce levels of fat, sugar and salt in foods, product ranges, and meals aimed specifically at children. The Agency will work with stakeholders to develop these criteria, and will subsequently ~~monitor the uptake by~~ agree targets for uptake with the food industry and publish the results of surveys monitoring progress against the targets.
- **By ~~March~~ June 2005** The Agency will publish best practice advice on signposting of foods, meals or snacks high in salt, sugar or fat and of healthier options. This advice will be for use by the food industry (including the food service sector). Guidance will also be provided on the use of high, medium and low descriptors on nutrition labelling panels. The Agency will work with stakeholders to develop this advice, and will subsequently ~~monitor~~ agree targets for uptake by with the food industry and publish the results of surveys monitoring progress against the targets.
- **By ~~March~~ June 2005** The Agency will publish best practice advice on the use of nutrition and health claims on food aimed specifically at children. The Agency will work with stakeholders to develop this advice, and will subsequently ~~monitor~~ agree targets for uptake ~~by~~ with the food industry and publish the results of surveys monitoring progress against the targets.
- **By December 2005** The Agency will revise guidelines on commercial sponsorship of educational materials.

- The Agency will press for action to address the imbalance in TV advertising of food to children, to be underpinned if necessary by Agency advice on differentiating foods high in fat, sugar and salt and healthier options. The Agency will monitor progress towards targets to be discussed with Ofcom, and consider further in summer 2005.

2. Schools

- Schools (and other publicly funded premises such as leisure centres) should ensure that vending machines are managed on the basis of a healthy vending approach which includes the promotion of healthier options
- Schools (and other publicly funded premises such as leisure centres) should not accept vending machines with branding associated with foods, meals or snacks high in fat, sugar or salt.
- Schools should provide and promote a range of healthy options at mealtimes and develop incentives to promote uptake of them in accordance with the Agency's guidelines. Local Education Authorities and Education Departments should support schools' efforts to make these changes.

3. Government and Ofcom (the broadcast media regulator)

- Government departments and agencies should not endorse promotional campaigns that encourage children to consume foods, meals or snacks high in fat, sugar or salt. They should endorse campaigns for healthier options.
- Government should continue to press for the following changes to EU rules:
 - mandatory nutrition labelling on all foods to include energy, fat, saturated fat, sugar and salt information (rather than sodium)
 - arrangements to prohibit use of nutrition and health claims on foods with adverse nutritional profiles
- Government should also press for the following change to EU rules:
 - an improved format for nutrition labelling, including use of high/medium/low descriptors for fat, saturated fat, non-milk extrinsic sugar and salt.

- Government and Ofcom should note the Agency's view that:
 - action to address the imbalance in TV advertising of food to children is justified
 - action on advertising during children's TV slots would be likely to have some beneficial effect and that wider action might also be justified, depending on the evidence generated during Ofcom's review
 - action on the relative amounts of advertising for foods, meals or snacks high in fat, sugar or salt and for healthier foods, and the times at which these adverts are scheduled, is likely to be the most effective option to address the imbalance.
- Ofcom should also note that:
 - it should review arrangements for regulation of sponsorship of programmes

4. Broadcasters

- Public sector and commercial broadcasters should exploit programming opportunities to promote healthy eating to children
- Others should follow the example of the BBC Worldwide initiative to consider introducing nutritional criteria for use of characters from its children's programmes

5. The ASA

- The Advertising Standards Authority should keep carry out an early review of the arrangements for regulation of food advertising to children using print media and new media such as internet and mobile phones.

6. Food manufacturers, retailers and the food service sector

- The Agency should work with food manufacturers and retailers to develop and encourage agree targets for uptake of best practice advice on:
 - reducing the amounts of fat, sugar and salt in foods and product ranges aimed specifically at children
 - use of front of label signposting of foods or snacks high in fat, sugar or salt and of healthier children's choices

- use of high, medium, and low descriptors for fat, sugar and salt on foods aimed at children
- use of nutrition and health claims on foods aimed at children which are high in fat, sugar or salt
- The Agency should work with the food service sector to develop and encourage uptake of best practice advice on:
 - reducing the amounts of fat, sugar and salt in meals aimed specifically at children
 - use of menu/notice signposting of meals high in fat, sugar or salt and of healthier children's choices
- Food manufacturers, retailers and the food service sector are encouraged to:
 - use promotions which encourage children to make or request repeat purchases (free gifts, token collect etc) for healthier foods
 - use new media such as mobile phones and the internet to promote healthier foods
 - use sponsorship (for example, of sporting events for children) only for brands associated with healthier foods
 - use celebrities, characters and cartoons to encourage children to eat healthier foods
- Food retailers are encouraged to:
 - use in-store promotional techniques, such as reduced prices, for healthier products when promoting to children
 - remove confectionery products, snacks and soft drinks from supermarket checkouts and, wherever practicable, replace them with healthier options such as fruit

7. Celebrities and those who license characters and cartoons


- Celebrities and those who license characters and cartoons should use their influence to encourage children to eat healthier options rather than foods, meals or snacks high in fat, sugar or salt.

Recent Developments in Ireland, France and the UK

1. In April the **Broadcasting Commission of Ireland** launched a consultation on a draft Children's Advertising Code³. The draft Code, which would apply only to broadcast advertising and to broadcasters based in the Republic of Ireland, would introduce new provisions on food advertising aimed at children, including:
 - a ban on “celebrities, sport stars and children’s heroes” promoting food and drink products, unless as part of a public health campaign;
 - a requirement that adverts for confectionery products display a toothbrush symbol on screen; and
 - a requirement that adverts for fast food⁴ include a spoken or written message that these types of food should be eaten in moderation.
2. Also in April, the **French Chamber of Deputies** agreed a draft Public Health Bill, which would introduce new provisions relating to TV advertising aimed at children and vending machines in schools for foods “whose nutritional composition may be harmful to children’s or adolescents’ health if consumed excessively”. These provisions would not prohibit advertising of these products, but manufacturers and advertisers would be required to finance adverts carrying healthy eating messages for broadcast during the same viewing periods as the food adverts. It is proposed that nutrition profiles to underpin the new provisions would be drawn up by AFSSA (Agence française de sécurité sanitaire des aliments), together with INPS (Institut national de prévention et d’éducation pour la santé). AFSSA and INFES would also advise on how often the healthy eating messages should be broadcast. The draft Bill would also ban vending machines containing fizzy drinks and sweets from all educational premises in France. The draft Bill must undergo a second reading before the Senate prior to definitive adoption, and no date for this has yet been set.
3. Activities led by **FSA-NI** include piloting a Young Consumers Newsletter and support of the Armagh and Dungannon Health Action Zone including a healthy breakfast club scheme and fresh fruit in schools projects. In **Scotland**, the Hungry for Success report sets out the Scottish Executive’s vision for a

³ Copies of the consultation, including a “child-friendly version”, can be downloaded from www.bci.ie. The consultation closed in May, and BCI are currently considering the responses received.

⁴ fast food is defined as “food coming under the recognised character of fast food, and/or inexpensive food that is prepared and served quickly.”



revitalised school meals service in Scotland. FSA Scotland has published target specifications for the total fat, saturated fat, sodium and sugar content of manufactured products used in school meals. FSA **Wales** is exploring partnership working with the Welsh Rugby Union to deliver healthy eating messages alongside physical activity to children. FSA Wales already supports a range of activities to promote healthy eating amongst children and young people, including provision of educational resources for primary schools and 'Get Cooking' course materials for 14-25 year olds.

